



KERR 240709
COMPANIES

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DOCKET NUMBER: FMCSA-2002-12334 - 26

1. Please indicate your primary occupation(s) from the following list:

- | | |
|---|---|
| <input type="checkbox"/> Truck Driver | <input type="checkbox"/> Owner-Operator |
| <input type="checkbox"/> Motor Coach / Bus Driver | <input checked="" type="checkbox"/> Fleet Manager / Owner |
| <input type="checkbox"/> Company Safety Director | <input type="checkbox"/> Transit System Administrator |
| <input type="checkbox"/> Commercial Driver Trainer | <input type="checkbox"/> Motor Carrier Insurance Provider |
| <input type="checkbox"/> Risk Assessment Specialist | <input type="checkbox"/> Labor Union Representative |
| <input type="checkbox"/> Motor Vehicle Admin. (State Driver's Licenses) | <input type="checkbox"/> Enforcement Officer (motor carrier safety) |
| <input type="checkbox"/> Public Interest Group | <input type="checkbox"/> Other |

2. Do you think a graduated commercial driver's license (GCDL) is needed?

- ☒ Yes ☐ No

3. Should issuance of a GCDL be linked to enrollment in a commercial driving training program?

- ☒ Yes ☐ No

4. Should the curricula of a commercial driver training program meet widely-endorsed standards for a student to be eligible to receive a GCDL while in training?

N/A

5. Approximately how many months/years of entry level training and experience should new drivers receive before "graduating" to an unrestricted CDL?

One Year

6. Should an applicant's past driving record be considered in issuing a GCDL?



Yes



No

7. How many of each of the following types of motor vehicle accidents and convictions within the past 12 months should cause an application to be denied a GCDL?



Passenger car or light truck motor vehicle accidents



Other convictions for motor vehicle traffic control violations



DUI/DWI convictions



Controlled substances convictions



Reckless driving convictions



Traffic violations and citations

8. Should penalties for drivers holding a GCDL, who have at-fault accidents or moving violations, be more severe than those for drivers with an unrestricted CDL?

N/A

9. How many months/years of passenger car or light truck driving experience should an applicant have before being issued a GCDL?

Minimum of two years

10. Which of the following restrictions should apply to entry level drivers operating under a GCDL?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Reduced hours of service | <input type="checkbox"/> Other |
| <input checked="" type="checkbox"/> Limitations on equipment type (e.g., doubles/triples, tank vehicles, motor coaches, etc.) | <input checked="" type="checkbox"/> Limitations on types of cargo (e.g., hazardous materials, livestock, liquids, etc.) |
| <input type="checkbox"/> Limitations on weather and visibility conditions (e.g., ice, snow, fog, night driving) | <input type="checkbox"/> Limitations on geography or terrain features (e.g., mountains) |
| <input checked="" type="checkbox"/> Limitations on distance or types of highways (e.g., miles per day, Interstate highways, etc.) | |
-

11. Should a fully licensed CDL driver be required to accompany and observe a driver with a GCDL? If yes, for how many weeks/months/years?

- ☐ Yes ☒ No
-

12. What is the minimum age at which an applicant should be eligible to receive a graduated CDL?

20 years old

13. Assuming that training requirements are met, what is the minimum age at which the holder of a graduated CDL should be eligible to graduate to an unrestricted CDL?

21 years old

14. How much testing (knowledge and road test) should be given to GCDL holders prior to issuing an unrestricted CDL?

- | | |
|--|---|
| <input type="checkbox"/> Single test to "graduate" to an unrestricted CDL | <input type="checkbox"/> Periodically while holding a GCDL until training is complete |
| <input checked="" type="checkbox"/> Initial test plus re-test at 1 year after receiving initial GCDL | <input type="checkbox"/> Other |
-

15. What other factors do you feel must be addressed in the implementation of a graduated CDL program?

Currently we face a shortage of CDL drivers in our area and in our small local delivery business, I believe, we do not need a full CDL driver but a graduated CDL licensed driver. The GCDL could be restricted by time, distance, age, etc. Please consider implementing a graduated system that would allow small local delivery businesses to operate with restrictions, but not be required to operate as an unrestricted CDL.

16. What costs would you or your organization anticipate incurring if a GCDL program is implemented?

My company would anticipate reduced costs in training and would enjoy a more stable employee roster. Currently, we pay for the training and national companies advertise in local papers and steal our CDL drivers. A graduated CDL would allow me to shift dollars to growing our business, not financing a continual CDL training department like we do now!